

\*\*\*\* CASE NUMBER: 502022CA008189XXXXMB Div: AJ \*\*\*\*

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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 22

KARINA MEZZASALMA,

Plaintiff,

v.

TARGET CORPORATION, a foreign  
corporation,

Defendant.

9/8/2022  
SDP  
106  
12:00 pm

CIVIL ACTION SUMMONS

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendants:

TARGET CORPORATION  
c/o Registered Agent  
CT Corporation System  
1200 South Pine Island Road  
Plantation, Florida 33324

Each defendant is required to serve written defenses to the complaint or petition on Thompson Legal, P.A., Plaintiff's attorney, whose address is: 5989 Stirling Road, Davie, FL 33314 within 20 days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on \_\_\_\_ day of Aug 24 2022, 2022.



JOSPEH ABRUZZO

As Clerk of the Court

By: 

As Deputy Clerk **Sandrine Grab**

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COMPLAINT FOR DAMAGES

COMES NOW, KARINA MEZZASALMA (*hereinafter* Plaintiff), by and through the undersigned counsel, and sues the Defendant, TARGET CORPORATION (*hereinafter* Defendant), and alleges as follows:

1. This is an action for damages which exceed the sum of Thirty Thousand Dollars (\$30,000.00), exclusive of interest and costs.
2. At all times material hereto, the Plaintiff was a natural person residing in Palm Beach County, Florida and otherwise *sui juris*.
3. At all times material hereto, Defendant was and is a foreign corporation authorized, licensed, and doing business in the State of Florida.
4. Defendant is subject to the jurisdiction of this Court because it operates, conducts, engages in, or carries on a business or business venture within this State and within Palm Beach County; caused injury to persons or property arising out of an act or omission it committed within this State and within Palm Beach County; and engages in substantial and not isolated activity within this State and Palm Beach County.
5. Defendant owned, controlled, operated, staffed, managed, and/or maintained the

premises located at 650 North Congress Avenue, Boynton Beach, Florida 33426 (*hereinafter* the Premises).

6. Venue is proper in Palm Beach County, Florida because the incident which is the subject of this Complaint occurred in Palm Beach County, Florida.

7. On or about September 6, 2021, the Plaintiff was an invitee at the Premises and lawfully on the Premises.

8. Plaintiff, while walking away from the self-checkout area, slipped on a puddle of yellow liquid which was in the front area near the optical department due to the careless and negligent manner in which the floors were maintained.

**COUNT I: NEGLIGENCE AS TO TARGET CORPORATION**

9. Plaintiff hereby adopts and incorporates the allegations set forth in Paragraphs 1–8 of the Complaint as if fully set forth herein.

10. The Defendant owed the Plaintiff a duty of reasonable care to maintain the Premises in a condition reasonably safe for the intended uses and free from all conditions which would render them dangerous or unsafe for the Plaintiff, and/or present an unreasonable risk of harm to Plaintiff during Plaintiff's lawful use of the Premises. This includes a reasonable effort to keep the Premises free from hazardous conditions that could have foreseeably given rise to loss, injury, or damage.

11. Defendant breached its duty because it negligently allowed a yellow liquid to accumulate in a highly trafficked area, creating a hazard and dangerous condition for business invitees entering and leaving the premises, and failed to properly maintain a clear walkway or throughway or warn of the presence of this dangerous condition.

12. As a result of the negligence of Defendant, the Plaintiff was injured on the Premises. As a direct and proximate result of the negligence of Defendant and want of due and reasonable care, the Plaintiff suffered severe bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, incurred expenses of hospitalization and medical and nursing care treatment, loss of earnings, loss of employment benefits, and loss of the ability to earn money. The injuries are either permanent or continuing in nature and the Plaintiff will suffer the losses and impairment into the future.

WHEREFORE, KARINA MEZZASALMA demands judgment against Defendant, TARGET CORPORATION, for bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, and loss of capacity for the enjoyment of life; for all medical and incidental expenses according to proof; for all loss of earnings, loss of employment benefits, and loss of earnings capacity; for costs of suit incurred in connection with this action; and for such other and further relief as the Court may deem proper.

**DEMAND FOR JURY TRIAL**

Plaintiff further demands a trial by jury on all issues so triable as a matter of right by jury.

Dated this August 22, 2022.

Respectfully submitted,

**THOMPSON LEGAL P.A.**

*Counsel for Plaintiff*

5989 Stirling Road

Davie, FL, 33314

Phone: 954-510-3366

*/s/ Stephanie Taylor*

Steve Thompson, Esq.

FL Bar No. 066269

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